UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

	)	
QSL CORPORATION d/b/a	)	
WAXCESSORIES and	)	
CKQ DESIGNS, INC.,	)	
	)	
Plaintiffs,	)	Civil Action No. 05-10395-NG
	)	
v.	)	
	)	
FIGI ACQUISITION COMPANY, LLC,	)	
	)	
Defendant.	)	
	)	

FIGI'S MOTION TO TRANSFER VENUE
FOR *FORUM NON CONVENIENS* UNDER 28 U.S.C. §1404

Under 28 U.S.C. § 1404, Defendant FIGI Acquisition Company, LLC ("FIGI") moves to transfer venue of this action to the United States District Court, Southern District of Califonia, in San Diego, where a first-filed action between the same parties, involving the same subject matter, is already pending.[1] FIGI submits a memorandum of law and two declarations (with attached exhibits) in support of this motion.

ACCORDINGLY, FIGI respectfully requests that this Court transfer venue of this case to the Southern District of California.

REQUEST FOR ORAL ARGUMENT

Under Local Rule 7.1(D), FIGI respectfully requests a hearing to resolve this motion.

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[1] The above-captioned Figi Acquisition Company, LLC, has changed its name to Figi LLC. FIGI therefore requests that the case caption be changed to reflect the correct entity name.

CERTIFICATION UNDER LOCAL RULE 7.1(A)(2)

I certify that, on March 9, 2005, I spoke by telephone with counsel for the plaintiffs, John L. Welch of Foley Hoag LLP, and conferred in a good faith attempt to resolve or narrow the issues raised in FIGI's motion. We were unable to resolve those issues.

Dated: March 9, 2005

FIGI, LLC
By its attorneys,

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CERTIFICATE OF SERVICE

I certify that, on the above date, I served a true copy of the foregoing document by hand delivery on counsel of record for each other party.

Erik Paul Belt

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